

HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Western Towboat Company,

\*

Plaintiff,

\*

**IN ADMIRALTY**

v.

\*

**CASE NO: C20-416-RSM**

Vigor Marine, LLC,

\*

**JOINT MOTION TO EXTEND  
EXPERT DISCLOSURE  
DEADLINE**

Defendant.

\*

**NOTE FOR HEARING  
MONDAY, DECEMBER 7, 2020**

\* \* \* \* \*

Joint Motion and  
Order to Extend  
Expert  
Disclosure  
Deadline, No. 20-  
416 RSM - 1

Simms Showers LLP  
201 International Circle  
Suite 230  
Baltimore, Maryland 21030  
Ph: 410-783-5795  
Fax 410-510-1789

1 Western Towboat Company (“Western”) and Vigor Marine’s (“Vigor”)  
2 move jointly to extend to February 5, 2021 (from December 30, 2020) the present  
3 case schedule deadline for disclosure of expert testimony.  
4

5 As grounds for this motion, Western and Vigor state that they have engaged  
6 in discovery but the relatively complex issues of the case require further time for  
7 identification of experts and presentation of expert reports.  
8

9 All other case dates would remain the same.

10 Western and Vigor respectfully request this Court to grant their motion and  
11 herewith submit a draft order.  
12

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19  
20  
21 Joint Motion and  
22 Order to Extend  
23 Expert  
24 Disclosure  
25 Deadline, No. 20-  
416 RSM - 2

Simms Showers LLP  
201 International Circle  
Suite 230  
Baltimore, Maryland 21030  
Ph: 410-783-5795  
Fax 410-510-1789

Dated: December 7, 2020.

<p><b>GASPICH LAW OFFICE PLLC</b></p> <p><u>/s/ Anthony J. Gaspich</u>          Anthony J. Gaspich, WSBA No. 19300          8094 Barthrop Pl NE          Bainbridge Island, WA 98110          Tel. (206) 956-4204          Fax: (206) 956-4214  <a href="mailto:tony@gaspichwilliams.com">tony@gaspichwilliams.com</a></p> <p><i>Attorneys for Plaintiff Western          Towboat Company</i></p>	<p><b>SIMMS SHOWERS LLP</b></p> <p><u>/s/ J. Stephen Simms</u>          J. Stephen Simms          201 International Circle, Suite 230          Baltimore, Maryland 21030          Ph: 410-783-5795          Fax 410-510-1789  <a href="mailto:jssimms@simmsshowers.com">jssimms@simmsshowers.com</a></p> <p><i>Attorneys for Plaintiff Western          Towboat Company</i></p>
<p><b>SCHWABE, WILLIAMSON &amp;          WYATT, P.C.</b></p> <p>By: <u>/s/ David R. Boyajian</u>          David R. Boyajian, WSBA #50195          Email: <a href="mailto:dboyajian@schwabe.com">dboyajian@schwabe.com</a>          Noah Jarrett, WSBA #31117          Email: <a href="mailto:njarrett@schwabe.com">njarrett@schwabe.com</a>          1211 SW 5th Ave., Suite 1900          Portland, OR 97204</p> <p><i>Attorneys for Defendant Vigor          Marine, LLC</i></p>	

Joint Motion and  
 Order to Extend  
 Expert  
 Disclosure  
 Deadline, No. 20-  
 416 RSM - 3

Simms Showers LLP  
 201 International Circle  
 Suite 230  
 Baltimore, Maryland 21030  
 Ph: 410-783-5795  
 Fax 410-510-1789

**ORDER**

The parties having so stipulated, and the Court finding good cause for entry hereof,

NOW, THEREFORE, IT IS HEREBY ORDERED that the date for disclosure of expert testimony shall be extended to February 5, 2021, all other dates in the Order Setting Trial and Related Dates (dkt 14) remaining the same.

Dated this 8<sup>th</sup> day of December, 2020.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Joint Motion and  
Order to Extend  
Expert  
Disclosure  
Deadline, No. 20-  
416 RSM - 4

Simms Showers LLP  
201 International Circle  
Suite 230  
Baltimore, Maryland 21030  
Ph: 410-783-5795  
Fax 410-510-1789

1 Presented by:

2 **SIMMS SHOWERS LLP**

3 /s/ J. Stephen Simms

4 J. Stephen Simms

5 201 International Circle, Suite 230

6 Baltimore, Maryland 21030

7 Ph: 410-783-5795

8 Fax 410-510-1789

9 [jssimms@simmsshowers.com](mailto:jssimms@simmsshowers.com)

10 **GASPICH LAW OFFICE PLLC**

11 s/Anthony J. Gaspich

12 Anthony J. Gaspich, WSBA No. 19300

13 Attorneys for Plaintiff

14 1000 Second Avenue, Suite 3330

15 Seattle, WA 98104

16 Tele. (206) 956-4204

17 Email: [tony@gaspichwilliams.com](mailto:tony@gaspichwilliams.com)

18 *Attorneys for Plaintiff Western Towboat Company*

19  
20  
21 Joint Motion and  
22 Order to Extend  
23 Expert  
24 Disclosure  
25 Deadline, No. 20-  
416 RSM - 5

Simms Showers LLP  
201 International Circle  
Suite 230  
Baltimore, Maryland 21030  
Ph: 410-783-5795  
Fax 410-510-1789

1 Approved as to form;  
2 Notice of presentation waived

3 **SCHWABE, WILLIAMSON & WYATT, P.C.**

4  
5 By: /s/ David R. Boyajian  
6 David R. Boyajian, WSBA #50195  
7 Email: [dboyajian@schwabe.com](mailto:dboyajian@schwabe.com)  
8 Noah Jarrett, WSBA #31117  
9 Email: [njarrett@schwabe.com](mailto:njarrett@schwabe.com)  
10 1211 SW 5th Ave., Suite 1900  
11 Portland, OR 97204

12 *Attorneys for Defendant Vigor Marine, LLC*

13 **CERTIFICATE OF SERVICE**

14  
15 I hereby certify that on December 7, 2020, I caused the foregoing to be filed  
16 on this Court's CM/ECF system for service on all record counsel.

17  
18 /s/ J. Stephen Simms

19  
20  
21 Joint Motion and  
22 Order to Extend  
23 Expert  
24 Disclosure  
25 Deadline, No. 20-  
416 RSM - 6

Simms Showers LLP  
201 International Circle  
Suite 230  
Baltimore, Maryland 21030  
Ph: 410-783-5795  
Fax 410-510-1789